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12 Attorneys for Defendant
13 THOMAS P. SCHMALZRIED, M.D.,
14 A Professional Corporation,

15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA (San Francisco)**

17 DION HALL and BELINDA
18 KHANTHONGDY,

19 Plaintiff(s),

20 v.

21 DEPUY ORTHOPAEDICS, INC.,
22 THOMAS P. SCHMALZRIED, M.D., A
23 PROFESSIONAL CORPORATION; and
24 DOES 1 through 20, inclusive,

25 Defendants.

26 CASE NO. 3:12-cv-00074-JW

27 **STIPULATION TO EXTEND TIME TO
28 RESPOND TO COMPLAINT (L.R. 6-1)**

Complaint served: December 7, 2011
Removal Date: January 5, 2012
Current Response Date: January 12, 2012
Agreed Response Date: February 11, 2012

29 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

30 Defendant Thomas P. Schmalzried, M.D., a Professional Corporation ("Defendant")
31 hereby requests, and Plaintiffs Dion Hall and Belinda Khanthongdy ("Plaintiffs") hereby agree
32 to Defendant's request, for an extension of time for Defendant to file a response to Plaintiffs'
33 Complaint. Plaintiffs' Complaint was filed on November 21, 2011, Defendant was served on or
34 about December 7, 2011 and the case was removed by on January 5, 2012.

1 THE PARTIES HAVE AGREED AND HEREBY STIPULATE to extend the time for
2 Defendant to respond to February 11, 2012.

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4 DATED: January 10, 2012 SEDGWICK LLP

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6 By: /s/ Michael M. Walsh
7 Ralph Campillo
8 Wendy Tucker
9 Michael M. Walsh
10 Attorneys for Defendant
11 THOMAS P. SCHMALZRIED, M.D., a
12 Professional Corporation

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14 DATED: January 10, 2012 LEVIN SIMES KAISER & GORNICK LLP

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16 By: /s/ David Markevitch
17 Lawrence J. Gornick
18 David Markevitch
19 Attorney for Plaintiffs
20 DION HALL and BELINDA HANTHONGDY

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1 Pursuant to Section X of General Order No. 45 regarding Electronic Court Filing, I
2 hereby certify that the content of this document is acceptable to David Markevitch, counsel for
3 Plaintiffs Dion Hall and Belinda Khanthongdy, and that I have obtained counsel's authorization
4 to affix his electronic signature to this document.

5 DATED: January 10, 2012 SEDGWICK LLP

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By: /s/ Michael M. Walsh

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Ralph Campillo

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Wendy Tucker

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Michael M. Walsh

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Attorneys for Defendant

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THOMAS P. SCHMALZRIED, M.D., a

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Professional Corporation

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